

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C.

**RECEIVED****DEC 20 1993**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

) Amendment of Section 76.51 of the  
) Commission's Rules to Include  
) Newton, New Jersey, and  
) Riverhead, New York in the  
) New York, New York-Linden-  
) Paterson-Newark, New Jersey  
) Television Market )

MM Docket No. 93-290

To: Chief, Mass Media Bureau

**COMMENTS OF WTZA IN SUPPORT OF INCLUSION  
OF KINGSTON AS A DESIGNATED COMMUNITY****WTZA-TV ASSOCIATES LIMITED  
PARTNERSHIP**Richard R. Zaragoza  
Barry H. Gottfried

Its Attorneys

Fisher, Wayland, Cooper  
and Leader  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037  
(202) 659-3494

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**SUMMARY**

WTZA-TV Associates Limited Partnership, the new licensee of WTZA(TV), Kingston, New York ("WTZA"), urges the Commission to add Kingston as a designated community in the current New York, New York-Linden-Paterson-Newark, New Jersey television market. The New York ADI, including cities such as Kingston that may appear to be relatively far from other parts of that market, is a unitary tri-state market. Stations licensed to various communities in the ADI, including WTZA, compete for the same economic support. Designation of Kingston will help to equalize competition between WTZA and much larger New York City station for carriage on cable systems in the a unitary New York ADI market.

The best evidence that the New York market cannot be divided into discrete, isolated zones is the existence of WNYI, a cable advertising network through which an advertiser can through a single purchase acquire time on cable systems throughout the ADI. As the market is currently designated, however, WTZA is at a clear competitive disadvantage in the New York ADI market. Designation of Kingston will help equalize competition between WTZA and the larger stations licensed to New York City with which it competes for economic support.

Addition of Kingston will greatly benefit the public. WTZA is about to expand into an all news station, modeled on the format of CNN "Headline News," with local New York market

orientation. Hyphenation will help bring this critically important source of news to cable subscribers throughout the New York ADI. It will also promote the Commission's policy of equalizing competition between independent UHF stations and larger VHF network affiliates.

WTZA's Grade B signal extends deep into the 35-mile zones of the large New York stations, and the Grade B contours of those stations extend deep into WTZA's central over-the-air market. WTZA also has plans to make use of a translator that will extend its Grade B quality signal even deeper into the areas covered by the New York City station. Moreover, if the Commission determines in this rulemaking to add Poughkeepsie to the market designation, the overlaps in areas covered by the Grade B signals of various stations in the New York market will become even more pervasive. These overlaps are graphic confirmation that WTZA competes for the same economic support in the same unitary cable market as do the large New York City stations. Designation of Kingston in order to equalize competition between WTZA and other stations in that market is therefore warranted.

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To: Chief, Mass Media Bureau

**COMMENTS OF WTZA IN SUPPORT OF INCLUSION  
 OF KINGSTON AS A DESIGNATED COMMUNITY**

WTZA-TV Associates Limited Partnership, the new licensee of WTZA(TV), Kingston, New York ("WTZA"), by its attorneys and pursuant to §§1.415 and 1.419 of the Commission's Rules, hereby comments on the Commission's rule making to consider amendment of Section 76.51 of its Rules to include additional designated communities in the New York, New York-Linden-Paterson-Newark, New Jersey television market. WTZA urges the Commission to add Kingston, New York as a designated community in the market. Designation of Kingston will help to equalize competition between WTZA and much larger New York City stations for carriage on cable systems in the unitary New York ADI market, and is warranted under the Commission's rules and policies.

**BACKGROUND**

1. WTZA is a UHF independent television station operating on Channel 62, licensed to Kingston, New York. As shown in Exhibit A hereto, since its inception in 1985 WTZA has won scores of awards for its high-quality local news and information programming. As a result of this quality, WTZA has built a significant viewership in Kingston and surrounding areas. For instance, out of 35 measured signals in Dutchess County (which include New York City and Albany broadcast stations as well as cable-only channels), WTZA is the sixth most widely viewed. In Dutchess County as well as Columbia County and Greene County, WTZA has a larger net weekly circulation than any cable-only channel. Further, WTZA has a larger net weekly circulation than all but one cable-only channel in Orange County (exceeded only by the USA Network) and Ulster County (exceeded only by CNN). See Affidavit of David Earle, Exhibit B, ¶ 2.

2. WTZA's success in the New York television market has been hindered, however, by its inability to gain cable carriage in most parts of that market. WTZA signed on the air in the wake of the courts' invalidation of the Commission's prior must carry rules. At that point, WTZA was a brand-new UHF independent with no cable carriage, no history, and, at least for the first few ratings periods, no measurable viewership. It was in that environment that WTZA was forced to begin gaining recognition among cable operators in a heavily cabled area. Exhibit B, ¶ 3.

3. WTZA spent countless hours in its first year courting local cable operators, showing tapes of its local newscasts, and trying to persuade cable operators that WTZA was a legitimate and permanent operation. After some three years, those efforts bore some fruit: WTZA was able to obtain nearly universal coverage within its 35-mile copyright-free zone, which comprises approximately 260,000 cable homes. This success was only partial, however, for WTZA's largest potential audiences lay to the north and south of the station's immediate service area. In those communities, WTZA ran into a wall of indifference from cable operators. The station's requests for carriage were consistently denied by these operators, who asserted -- wrongly -- that other broadcasters offered similar programming, that their systems did not have enough channels to carry WTZA, and that no interest existed in their areas for news and information from the central Hudson Valley. Id., ¶ 4.

4. WTZA's inability to attain cable carriage in these crucial surrounding areas has had -- and continues to have -- a profound effect on the station's economic performance. First, it has limited WTZA's selling area to about 350,000 homes out of the approximately 6.7 million television households in the New York ADI. Second, denial of cable carriage has limited the station's viewing primarily to fringe ADI areas where Arbitron and Nielsen diary samples are thin. This has diminished WTZA's ratings. Third, denial of cable carriage in crucial outlying areas has reduced the station's cumulative audience, resulting in a direct

negative impact on WTZA's advertising rates. Finally, denial of cable carriage has prevented WTZA from selling effective coverage to key advertisers in southern Dutchess and Orange Counties (the station's two most important "core" service areas). This is because WTZA is unable to deliver important cable viewers in Westchester and Rockland Counties just to the south of these critical counties, or viewers to the east along the Route 84 corridor in Danbury, Connecticut. Id., ¶ 5.

5. Because of its past inability to acquire cable carriage in important surrounding areas, WTZA has literally hit a "brick wall" of competitive viability. While the station has earned a strong following in a considerable area, it has been denied the ability to gain recognition in the additional areas it needs to become a true player in the heavily competitive New York television market. Simply put, after doing all that it possibly can do, WTZA still is forced to exist as a fragile UHF independent, competing at a severe disadvantage against other market stations with widespread cable carriage. As a result, WTZA has accumulated significant losses since signing on and has never shown an annual operating profit. Id., ¶ 6. Without the ability to expand by acquiring cable carriage outside the Kingston area, WTZA is not an economically viable entity.

6. Now, the adoption of the 1992 Cable Act has offered the hope of allowing WTZA not only to survive but also to realize its full potential. Afforded mandatory carriage rights throughout the unitary New York ADI market, WTZA will be able to reach the



critical larger audiences that it previously has been denied, and more. This new-found ability to compete will permit the station to increase its advertising revenue, thereby enabling it to continue its historical emphasis on news. Indeed, the Cable Act has presented WTZA an opportunity to inaugurate programming plans for the station's viewers which will make WTZA even more deserving of carriage throughout the New York television market: WTZA is about to expand into an all news and information station -- a station modeled on the "newsheel" format of CNN "Headline News," with local New York market orientation. Affidavit of Richard French, Exhibit C, ¶ 2.

7. In conjunction with its new format, WTZA plans to add news bureaus in Westchester and Rockland counties in New York, and in Danbury and Stamford, Connecticut. Thereafter, WTZA plans to add additional news bureaus, in stages, in Bergen County, New Jersey and perhaps in New York City. Id., ¶ 3. In short, if it can take advantage of its must carry rights, WTZA will evolve from a struggling UHF independent to a full-fledged market competitor in the full New York market, offering valuable news and information garnered from, and presented to, areas that the station has never before reached by cable.

8. The need to indemnify cable operators for copyright royalty for "distant" carriage, however, presents a grave threat to WTZA's plans. Because Kingston, New York is not one of the designated communities in the New York-Linden-Paterson, Newark, New Jersey market, cable systems have contended that WTZA is a

"distant" or "partially distant" signal, the carriage of which causes increased copyright liability within the New York television market but beyond a 35-mile zone surrounding Kingston.<sup>1/</sup> Indeed, WTZA has estimated that its indemnity for carriage in the New York television market would be over \$5.0 million dollars per six-month period. Id., ¶ 3. Although WTZA has taken steps to obtain secondary retransmission rights from the owners of all its programming, thus eliminating any need for New York ADI cable systems to pay distant-signal royalties, it is not certain whether the cable systems will nonetheless contend that they are entitled to indemnity payments. And because it is not economically feasible for WTZA to pay such fees, there is a serious threat that the station will not be able to gain carriage on cable systems in substantial portions of the New York ADI. Id. ¶ 4.

9. In sum, unless steps are taken to eliminate or reduce the copyright royalty costs for cable carriage of the station, WTZA's plans to become a true competitor in the New York market will be seriously jeopardized. By adding Kingston as a designated community, the Commission would create a more equitable copyright-free zone for the station -- equal to the copyright-free zone of its competitors -- thereby facilitating

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1/ See §76.55(c)(2) of the Commission's Rules (requiring that stations must indemnify cable operators for any increased copyright costs resulting from carriage in order to qualify for must-carry).

carriage of WTZA where such carriage will serve the public interest, throughout the New York ADI.

### ARGUMENT

10. For purposes of Section 76.51 of the Commission's Rules, containing a "Table of Major Television Markets," a hyphenated market is one in which "more than one major population center support(s) all stations in the market but with competing stations licensed to different cities within the market areas."<sup>2/</sup> Market hyphenation "helps equalize competition" by creating equal copyright-free zones where portions of a market are located beyond the Grade B contours of some stations, yet all stations compete for the same economic support.<sup>3/</sup> The Commission has recently stated that it will add a new community such as Kingston to a market designation if there is a "commonality between the proposed community to be added . . . and the market as a whole."<sup>4/</sup> Commonality is to be determined by using such factors as:

- (1) the distance between the proposed community and the market-designated communities;
- (2) the extent that redesignation to include the proposed community would allow the

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2/ Cable Television Report and Order, 36 FCC 2d 143, 176, (1972).

3/ Cable Television Report & Order, 36 FCC 2d at, 176.

4/ Report and Order (MM Dkt. Nos. 92-259 et al.), FCC 93-144, released March 29, 1993, at ¶ 50.

station additional rights in areas beyond its Grade B contour;

- (3) the particularized need of the station; and
- (4) the resulting benefit to the public from redesignation.<sup>5/</sup>

11. Because addition of Kingston to the market designation will create equal copyright-free zones for WTZA and its much larger New York City competitors, and therefore help to equalize competition in the New York unitary market between WTZA and those large stations, the Commission should add Kingston to the designation.

**A. The New York ADI Is a Unitary Three-State Economic Market**

12. It is incontrovertible that the New York ADI, including cities such as Kingston that may appear to be relatively far from other parts of that market, is a unitary tri-state market. The best evidence that the New York market cannot be divided into discrete, isolated zones is the existence of WNYI, a tri-state cable advertising interconnect. WNYI serves a sweeping geographic area covering more than 3.5 million cable households in communities in New York, Connecticut, and New Jersey.<sup>6/</sup> Using the interconnect, an advertiser can through a single purchase

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5/ E.g., Report and Order (MM Dkt. No. 92-306) (Clermont, Florida), DA 93-579, released May 19, 1993, at ¶ 3, citing Major Television Markets (Fresno-Visalia, California), 57 RR2d 1122 (1985).

6/ Communications Daily, May 18, 1993, at 9-10.

acquire time on cable systems in New York City, Long Island and Westchester County in New York, as well as in Northeastern New Jersey and Southern Connecticut. There could hardly be more graphic evidence that the New York ADI is one integrated advertising market and that WTZA must compete for the same economic support as do the large stations in that market licensed to New York City.

13. As the market is currently designated, however, WTZA is at a clear competitive disadvantage. The large stations licensed to New York City have 35-mile copyright free zones around each of the designated communities, while WTZA is confined to a 35-mile zone around Kingston. In order to compete effectively in the unitary New York market, WTZA needs to enjoy the copyright-free carriage rights that its larger competitors enjoy. Thus, this is the classic situation where the Commission's policies require addition of Kingston: such designation will "help equalize competition" between stations competing for the same economic support.<sup>7/</sup>

**B. Inclusion of Kingston Will Greatly Benefit  
the Public Interest In Competition**

14. Addition of Kingston to the market designation, and the resulting enhancement to WTZA's ability to compete in the New York market, will also bring substantial benefits to television viewers. It is beyond dispute that WTZA's news and information

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<sup>7/</sup> Cable Television Report and Order, 36 FCC 2d at 176.

format has been and will continue to be extremely valuable to the public. Indeed, one of the explicit findings by Congress in legislating must carry was that "[b]roadcast television stations continue to be an important source of local news and public affairs programming . . . critical to an informed electorate."<sup>8/</sup> Congress intended to insure that stations such as WTZA would have access to cable carriage in their markets and, thus, to help preserve them as viable outlets for local expression.

15. The growth of WTZA that hyphenation would facilitate is also consistent with Congress' intent of ensuring the viability of UHF independent television stations.<sup>9/</sup> Moreover, permitting WTZA market-wide cable carriage will further the Commission's own long-held policy of fostering the growth of free, over-the-air, UHF independent stations. From the very beginning of the UHF television service, the Commission has recognized that UHF stations are by definition technically inferior to their VHF counterparts, that UHF stations cost far more to construct than

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8/ 1992 Cable Act §2(a)(11) (emphasis added).

9/ See House Committee on Energy and Commerce, H. Rep. No. 628, 102d Cong., 2d Sess., at 50-52 (1992) ("House Report") (quoting with disapproval remark of one cable operator who dropped local signals: "Why have people trained to watch UHF?"); Senate Committee on Commerce, Science, and Transportation, S. Rep. No. 92, 102d Cong., 1st Sess., at 41-43, 58-61 (1991) ("Senate Report") (noting the large number of independent stations dropped by cable systems); 138 Cong. Rec. S14612 (daily ed. Sept. 17, 1992) (statement of Sen. Adams) (noting that must carry guarantees distribution of small independent commercial TV stations and citing problems one small UHF station in Washington had with cable companies).

VHF stations, and that UHF stations are less established in the minds of viewers and cable operators than their VHF competitors.

As the Commission has recently acknowledged:

[UHF stations] . . . are often handicapped by less favorable signal propagation characteristics and higher technical operating costs than VHF stations and . . . tend to be less profitable than their VHF competitors. Moreover, these stations are generally newer and not affiliated with one of the national broadcast networks.<sup>10/</sup>

16. Thus, the Commission has long taken steps to equalize the competitive disadvantages faced by UHF broadcasters.<sup>11/</sup> More recently, the Commission has proposed amending its television multiple ownership rules to permit common ownership of UHF stations with overlapping contours, recognizing the special obstacles that UHF broadcasters face in an increasingly competitive video marketplace.<sup>12/</sup> And only a few months ago, the

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10/ Notice of Proposed Rulemaking, Review of the Commission's Regulations Governing Television Broadcasting, 7 FCC Rcd 4111, 4115 (1992) [hereinafter TV Ownership NPRM].

11/ See, e.g., Report and Order in Docket No. 18433, 21 F.C.C.2d 245 (1970) (requiring TV receivers to have UHF tuning comparable to VHF tuning); Report and Order, Docket No. 28309, 62 F.C.C.2d 164 (1976) (requiring TV receivers to have a UHF receiving antenna if supplied with a VHF antenna); Improvements to UHF Television Reception, 90 F.C.C.2d 1121 (1982) (issuing specific consumer recommendations concerning UHF antenna configuration and placement); Multiple Ownership Rules, 100 F.C.C.2d 74, 93-94 (1985) (decreasing the value of UHF stations in counting broadcast interests for purposes of the multiple ownership rules, thereby allowing licensees to own more UHF stations).

12/ TV Ownership NPRM, 7 FCC Rcd at 4115.

Commission decided to exempt emerging broadcast networks from the application of the financial interest and syndication rules, stating that such emerging networks have provided a "solid financial base" to "formerly marginal UHF stations."<sup>13/</sup>

17. Addition of Kingston to the market designation would facilitate this established policy of the Commission. If WTZA cannot get cable carriage because of copyright-royalty indemnity problems, the station will be locked into the severely limited competitive status it holds today. WTZA will be unable to reach the large audiences in surrounding areas that are critical to its planned expansion. This sizable loss of viewers will impair WTZA's ability to compete effectively for advertising dollars, and thereby substantially hinder the station's ability to serve its existing market, much less undertake its plans for expanding its service. By adding Kingston to the New York market designation, thereby eliminating an unfair copyright royalty penalty to WTZA, the Commission will promote its policy of equalizing competition between UHF stations such as WTZA and larger VHF network affiliates.

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13/ Second Report and Order, Evaluation of the Syndication and Financial Interest Rules, 8 FCC Rcd 3282, 3333 (1993). See also Fox Broadcasting Co., 5 FCC Rcd 3211, 3211 & 3215 n.8 (1990) (granting temporary waiver of "Finsyn" rules to Fox Broadcasting Network, based in part on "the Commission's longstanding concern about the continued and overall health of the UHF service").



**C. WTZA Has a Particularized Need for Inclusion of Kingston In the Designation**

18. WTZA has a particularized need for the addition of Kingston to the New York market designation. As explained in detail above, the station is a valuable source of local news reporting, and will become an invaluable all news station competing in the entire unitary New York market if it is able to exercise its must-carry rights. See ¶¶ 1, 6-7 above. WTZA is in no economic position, however, to indemnify cable systems for huge copyright royalty payments, and will be carried only if these fees can be minimized. Addition of Kingston to the market designation is a means of eliminating royalty payments by cable systems in many parts of the New York ADI and will therefore permit competition by WTZA on a level playing field with the large New York City stations.

19. It should be noted that recent developments in the television marketplace enhance the need for the Commission to equalize the competitive disadvantage of WTZA. The only two VHF independents in the New York ADI, WWOR and WPIX, have announced plans to affiliate with the new Paramount and Warner Brothers networks, respectively.<sup>14/</sup> After these affiliations, the only independent television stations in the New York ADI will be small UHF stations such as WTZA. It would be inconsistent with both

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<sup>14/</sup> See e.g., "It's Warner v. Paramount," Broadcasting & Cable, November 1, 1993, p. 6; "Warner Details Hybrid WB Network," Broadcasting & Cable, November 8, 1993, p. 28.

Congressional and Commission policies if independent WTZA were unable to compete for cable carriage because of copyright-royalty problems. Addition of Kingston to the market designation is appropriate so as to allow for robust competition by WTZA in the unitary New York market.

**D. Addition of Kingston Will Not Make  
Unwarranted Additions to WTZA's Rights  
Beyond Its Grade B Contours**

20. As it is, WTZA's authorized Grade B contour extends into portions of Bergen County, New Jersey and as far as Scarsdale in Westchester County, New York to the south. The Grade B also extends into Connecticut counties which are part of the New York ADI. Indeed, WTZA's Grade B signal extends deep into the 35-mile zones of the large New York City stations. See map attached as Exhibit D. Moreover, the Grade B contours of New York City stations such as WNBC, WCBS and WABC extend as far north as Dutchess County and therefore extend deep into WTZA's central over-the-air market. These overlaps are graphic confirmation that WTZA competes for the same economic support in the same cable market as do the large New York City stations.<sup>15/</sup>

21. It should be noted that both WTZA's plans and pending Commission action will likely serve to increase the overlaps between WTZA's coverage area and those of other stations in the market. WTZA has plans to make use of a translator which will

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<sup>15/</sup> Compare Report and Order in MM Docket 84-111 (Melbourne and Cocoa, Florida) 57 RR 2d 685, 690-2 (1985).

serve to extend its 64 dBu quality signal (i.e., Grade B quality) even deeper into the areas covered by the New York City stations' Grade B zones. See Exhibit C, ¶ 3. Moreover, the Commission's Notice of Proposed Rulemaking in the instant proceeding seeks comment on whether Poughkeepsie should be added to the market designation. WTZA places a Grade B signal -- indeed a city grade signal -- over Poughkeepsie, as do the major New York City stations; and the station in Poughkeepsie, WTBY(TV), puts a Grade B signal over portions of New York City. Thus, if the Commission determines to add Poughkeepsie to the market designation, the overlaps in areas commonly covered by the Grade B signals of the various stations in the unitary New York market will become even more pervasive. The planned changes in the market make even more apparent the need to equalize competition between various stations operating in that market, by adding cites such as Kingston to the designation.

22. It should also be noted that because WTZA's mandatory cable carriage rights derive from its location within the New York ADI -- not from any hyphenation -- the addition of Kingston to the designation will not increase the station's must-carry rights beyond that which the Commission's Rules already permit. Thus, the Commission need not be concerned, as it has been in the past in considering proposed hyphenations, about extending WTZA's must carriage zone. In any case, the Commission has held that some extension beyond the Grade B zone is warranted in order to

equalize competition among stations operating in the same economic market.<sup>16/</sup>

23. In sum, the extent of overlapping Grade B contours confirms what is proved by other circumstances: the New York ADI is a unitary tri-state market. Designation of Kingston in order to equalize competition between WTZA and other stations in that market is therefore warranted.

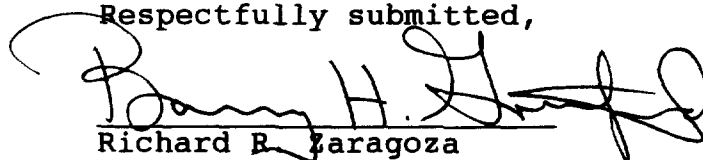
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<sup>16/</sup> Report & Order in MM Docket No. 84-111, 57 RR 2d at 692-3.

**CONCLUSION**

As the New York market is currently designated, WTZA is at a clear competitive disadvantage. In order to compete effectively, WTZA needs to enjoy the copyright-free carriage rights that its larger New York City competitors enjoy. Thus, this is the classic situation where the Commission's policies require addition of Kingston to the designation so as to "equalize competition" among stations competing for the same economic support in the New York ADI market.

Respectfully submitted,



Richard B. Paragoza  
Barry H. Gottfried

Its Attorneys

Fisher, Wayland, Cooper  
and Leader  
1255 23rd Street, NW  
Suite 800  
Washington, DC  
(202) 659-3494

December 20, 1993

**EXHIBIT A.**

# WTZA AWARDS

YEAR	AWARD	TITLE	EMPLOYEES
*1986	NYSBA	Outstanding Best News Mini-Series	Amber Edwards
1986	NYSBA	Outstanding Best Commercial	Steve Tatsapaugh
*1986	NYSBA	Outstanding Public Service Announcement Campaign	
*1986	NYSBA	Outstanding Promotional Announcement	
1987	NYSBA	Outstanding Single Children's Program	Nancy Cozean, Kate McGoldr
1987	NYSBA	Outstanding Public Affairs Program Series (On The River)	Brian Madden
1987	NYSBA	Outstanding Sportscast	Brian Kenny
1987	NYSBA	Outstanding Coverage of Spot News	Marge Stevens, Mary Conwa
1987	NYSBA	Outstanding News Mini-Series	Marge Stevens, Pat Bourque
1988	NYSBA	Outstanding Television Promotion Announcement	Robert Zimet
1988	NYSBA	Outstanding Public Affairs Program Series (On The River)	Brian Madden
*1988	NYSBA	Outstanding Public Service Announcement	Dale Gustin
*1989	NYSBA	Outstanding Public Affairs Program Series (On The River)	Brian Madden, Hannah Hawki
1989	NYSBA	Outstanding News Mini-Series (Investigative)	Tom Mieczuk
1989	NYSBA	Outstanding Coverage of Local Sporting Event	Brian Kenny
1989	NYSBA	Outstanding Commercial (Colandrea Pontiac)	Mark Greenstone
1989	NYSBA	Outstanding Promotion Announcement	Carol Scalzo
1990	NYSBA	Outstanding Public Affairs Program Series (On The River)	Greg Floyd
1990	NYSBA	Outstanding Sportscast	Brian Kenny
1990	NYSBA	Outstanding Single Public Affairs Program (H.V. Hosp:Condition Critical)	Ed McCann
1990	NYSBA	Outstanding Coverage of Spot News (Wall Collapse in E. Coldenham)	Cy Porter, Barbara Pinto
1990	Eclat	GOLD - (Single spot under \$2500) Family of Woodstock "Survivor"	Ed McCann
1990	Eclat	SILVER - (Single Spot under \$2500) "Tricks of the Trade (Promo Annncmt)	Steve Houk
1991	NYSBA	Outstanding Public Service Announcement on Drunk & Driving Drunk	Steve Tatsapaugh
1991	NYSBA	Outstanding Coverage of Local Sporting Event	Brian Kenny
1991	NYSBA	Outstanding Public Affairs Program Series (On The River)	Greg Floyd
1991	NYSBA	Outstanding Television Promotion Announcement (WTZA News)	Steve Houk
1991	NYSBA	Outstanding Spot News (The Dorsey Case)	Tom Mieczuk
1991	NYSBA	Outstanding Television Commercial (Dutchess Community College)	Chris Neher, Dale Gustin
*1991	NYSBA	Outstanding Public Affairs Announcement (Toys for Tots)	Chris Neher
1991	Eclat	GOLD - (Video Production) The Right Way To Fly (American Airlines)	Steve Tatsapaugh
1991	Eclat	SILVER - (TV Self-Promotion) WTZA News - Generic	Steve Houk
1992	NYSBA	Outstanding Television Commercial (Bren's Timbermill)	Chris Neher
1992	NYSBA	Outstanding Sportscast	Brian Kenny
1992	NYSBA	Outstanding Local Sporting Event	Brian Kenny
1992	NYSBA	Outstanding Single Public Affair Program (Dead Drunk)	Ed McCann, Hannah Hawkins
1992	NYSBA	Outstanding Public Affairs Program Series (On The River)	Greg Floyd

## WTZA AWARDS

YEAR	AWARD	TITLE	EMPLOYEES
1993	NYSBA	Outstanding Sportscast	Brian Kenny
1993	NYSBA	Outstanding Local Sporting Event (Kaaterskill Spring Rush)	Brian Kenny
1993	NYSBA	Outstanding Television Commercial (The Mountain Malt & Hops Shoppe)	Chris Neher



**EXHIBIT B**